

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-534-MN-CJB
)	
LANCIUM LLC, MICHAEL T.)	
MCNAMARA, and RAYMOND E. CLINE,)	
JR.)	
)	
Defendants.)	

**DEFENDANTS’ MOTION TO STRIKE THE TRADE SECRET
MISAPPROPRIATION COUNTS IN THE SECOND AMENDED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(f), Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively “Lancium”) hereby move this Court to strike Count III, Trade Secret Misappropriation Under Federal Defend Trade Secrets Act, 18 U.S.C. § 1836 and Count IV Trade Secret Misappropriation Under Louisiana Civil Practice And Remedies Code, Title 51, Section 13-A (collectively the “Trade Secret Counts”) in Plaintiffs Bearbox LLC and Austin Storms’ (“Bearbox”) Second Amended Complaint (D.I. 103). The grounds for this motion are set forth in Lancium’s letter brief filed contemporaneously with this motion.

Dated: March 3, 2022

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